

Before the
Federal Communications Commission
Washington, DC 20554

In the Petition of)	
)	
Franklin County, Georgia)	
)	
For Modification of the Television Market)	MB Docket 18-158
of Station WSB-TV (ABC), Atlanta, GA)	File No. CSR-8957-A
)	
For Modification of the Television Market)	MB Docket 18-159
of Station WXIA (NBC), Atlanta, GA)	File No. CSR-8958-A
)	
For Modification of the Television Market)	MB Docket 18-160
of Station WAGA (FOX), Atlanta, GA)	File No. CSR-8959-A
)	
For Modification of the Television Market)	MB Docket 18-161
of Station WGCL (CBS), Atlanta, GA)	File No. CSR-8960-A

OPPOSITION TO MOTION FOR AN EXTENSION OF TIME

Franklin County, Georgia respectfully opposes the Monday, October 15, 2018, Motion for Extension of Time to file an Application for Review filed by WYFF Hearst Television Inc., licenses of NBC affiliate WYFF(TV), Greenville, South Carolina (“WYFF”); Meredith Corporation, licensee of FOX affiliate WHNS(TV), Greenville, South Carolina (“WHNS”); Nexstar Broadcasting, Inc., licensee of CBS affiliate WSPA-TV, Spartanburg, South Carolina (“WSPA”); and WLOS Licensee LLC, licensee of WLOS(TB), Asheville, North Carolina (“WLOS”) (collectively, the “Stations”). In opposition, Franklin County states as follows:

1. The citizens of Franklin County have exercised great patience in working through the change in law via the STELA Reauthorization Act of 2014, the defining of the policies and procedures to implement that law¹, and the actual petition process for market modification. The

¹ *Amendment to the Commission’s Rules Concerning Market Modification; Implementation of Section 102 if the STELA Reauthorization Act of 2014*

release of the Memorandum Opinion and Order (the "Franklin County Order")² was viewed as a great accomplishment after many, many years of continued efforts to bring citizens the in-state broadcasting they have long desired.

2. Franklin County wishes to continue with the granted Market Modification in an expeditious and efficient manner, and avoid any undue delay.³

3. The Stations purported "good cause" for an extension is nothing more than a generalized statement that the extension would serve the interest of all parties.

4. For purposes of the satellite market modification rules, a community is defined as a county⁴. Pursuant to this definition, Franklin County filed a market modification request independent of other "orphan" counties. As such, the Franklin County Order should be evaluated and reviewed on its own accord.

5. The Stations are prepared to timely file their Application for Review of the Franklin County Order on or before October 17, 2018.⁵

For the foregoing reasons, the motion for extension of time should be denied.

Dated: October 16, 2018

Respectfully submitted,

By: /s/ Beth Thomas

BETH THOMAS
County Manager
Franklin County

² *Franklin County, Georgia, Petitions for Modification of the Satellite Television Markets of WSB-TV, WAGA, WXIA, and WGCL, Atlanta, Georgia*, Memorandum Opinion and Order, MB Dockets 18-158, 18-159, 18-160, 18-161 (rel. September 17, 2018) ("Franklin County Order").

³ County Manager, Beth Thomas, responded to attorney Tim Nelson's October 15, 2018 email stating that Franklin County was not agreeable to the Motion for Extension of Time.

⁴ 47 CFR § 76.5 (gg)(2).

⁵ *Four Greenville Stations*, Motion for Extension of Time

I, Beth Thomas, hereby certify that a true and correct copy of the foregoing Opposition to Motion for Extension of Time were placed in first class U.S. mail, postage prepaid, on this 16th day of October, 2018 addressed to the following:

WSB-TV
601 West Peachtree St. NE
Atlanta, GA 30309

WLOS
110 Technology Drive
Asheville, NC 28803

WXIA
One Monroe Place NE
Atlanta, Ga., 30324

WYFF
505 Rutherford Street
Greenville, SC 29609

WAGA
1551 Briarcliff Rd. NE
Atlanta, GA 30306

WHNS
21 Interstate Court
Greenville, South Carolina 29615

WGCL
425 14th Street NW
Atlanta, GA 30318

WSPA
250 International Drive
Spartanburg, SC 29303

DIRECTV, LLC
Local-Into-Local Market Modification
2260 East Imperial Highway
El Segundo, CA 90245

Ms. Alison A. Minea
Director & Senior Counsel, Regulatory Affairs
Dish Network, LLC
1110 Vermont Ave, NW
Suite 750 Washington, DC 20005

/s/

Beth Thomas, Franklin County Manager
Date: October 16, 2018